

**EXHIBIT 4**  
**Letter from Comcast**



January 7, 2015

**Via Email and Overnight Mail**

Suzanne Lupia, Director of Broadcast Operations  
Western Pacific Broadcast, LLC  
400 North Ashley Drive, Suite 2500  
Tampa, FL 33602

Re: WMDE's Request for Mandatory Carriage on Comcast's Cable Systems in the  
Washington D.C. (Hagerstown) DMA and Kent County/Dover, Delaware

Dear Suzanne:

This correspondence is in response to our ongoing discussions regarding John Troutman's letter, WMDE's Chief Legal Counsel, dated September 22, 2014, requesting mandatory carriage of WMDE (TV) on Comcast cable systems serving communities in (i) the Washington D.C. (Hagerstown) Designated Market Area ("DMA"), and (ii) Kent County, Delaware.

As you know, federal law requires a television station that has requested mandatory carriage with respect to a cable system to deliver a "good quality signal" to the principal headend of such cable system.

Comcast has determined that the principal headend facility of each of the following Comcast cable systems receives a good quality WMDE over-the-air signal (which as of the date hereof is transmitted by the station in high definition format): Alexandria, Arlington, Calvert County, Charles County/Waldorf, Frederick County, Loudoun County, Montgomery MD, Prince George's County, Prince William, Reston, Washington D.C., and Kent County/Dover. To accommodate requisite channel realignments and accompanying notifications, Comcast will launch and retransmit, pursuant to 47 C.F.R. §76.56 *et seq.*, WMDE's primary signal on each of the above-mentioned cable systems no later than March 31, 2015.

Comcast intends to retransmit WMDE's primary signal in standard-definition format (or in a converted to analog format, if applicable) on cable channel (i) 21 in each of the above referenced cable systems except for Montgomery, and (ii) 12 in the Montgomery cable system. Comcast intends to retransmit WMDE's primary signal in high-definition format on cable channel (i) 806 in each of the above referenced cable systems except for Kent County/Dover, and (ii) 793 in the Kent County/Dover cable system.

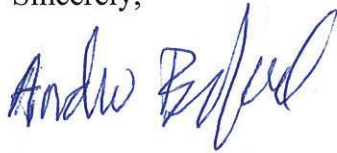
As indicated on the attached signal measurement forms, Comcast has determined that, WMDE does not deliver a good quality over-the-air signal to the following principal headend facilities: Augusta WV, Bridgewater Harrisonburg VA, Culpeper VA, Frostburg Keyser WV, Hancock

MD, Sharpsburg Shepherdstown WV, Spotsylvania County aka Fredericksburg VA, Springfield WV, Luray (Winchester), Warrenton Fauquier County and Waynesboro (Staunton) (collectively, the "Failing Headends"). In addition, Comcast has determined that WMDE's co-owned low-power broadcast television station WWTD-LD does not deliver a good quality over-the-air signal to such Failing Headends. Therefore, Comcast will not retransmit WMDE on the outlying (small) cable systems served by such Failing Headends at this time.

To the extent you want to perform your own signal measurements, or desire to deliver a good quality signal via alternative means to the applicable Failing Headends, please contact Rick Otradovec via email at [Rick\\_Otradovec@comcast.com](mailto:Rick_Otradovec@comcast.com) or by telephone (410) 931-8506, to make the necessary arrangements. Upon WMDE's delivery of a good quality signal to the applicable principal headend facility(ies), as confirmed by Comcast's testing of the signal at such headend facility(ies), and upon Comcast's provision of any required subscriber notification in accordance with FCC rules, Comcast will promptly launch WMDE's primary signal in the applicable cable communities.

Please let me know if you have any questions.

Sincerely,



Andrew Brayford

---

cc: John Troutman, Chief Legal Counsel, Western Pacific Broadcast, LLC  
Terry Crosby, CNZ Communications, LLC  
Beth Selby, Comcast Cable  
Michael Nissenblatt, Comcast Cable

**EXHIBIT 5**  
**Comcast Xfinity Channel Line-Ups**



## Choose your service area

ZIP CODE: 22309

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Alexandria Digital

Comcast Alexandria Standard Cable

[View more service areas](#)**CHANNEL LINEUP:**

804 WRCD NBC



805 WTTGD FOX



806 WMDE



807 DWJLA ABC



808 News8

Cancel

SAVE

## Choose your service area

ZIP CODE: 22309

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Alexandria Digital

Comcast Alexandria Standard Cable

[View more service areas](#)**CHANNEL LINEUP:**

019 WHUT PBS



020 WDCA MyNetworkTV



021 WMDE



022 WMPT PBS



023 HSN HSN

Cancel

SAVE

## Choose your service area

ZIP CODE: 22309

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Alexandria Digital

Comcast Alexandria Standard Cable

**CHANNEL LINEUP:**

019

WHUT

PBS



020

WDCA

MyNetworkTV



021

WMDE



022

WMPT

PBS



023

HSN

HSN

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 22312

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Alexandria Digital

Comcast Alexandria Standard Cable

**CHANNEL LINEUP:**

020 WDCA MyNetworkTV



021 WMDE



022 WMPT PBS



023 HSN HSN



024 JWLTV JewelryTV

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 22312

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Alexandria Digital

Comcast Alexandria Standard Cable

**CHANNEL LINEUP:**

804 WRCD NBC



805 WTTGD FOX



806 WMDED



807 DWJLA ABC



808 News8

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 22312

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Alexandria Digital

Comcast Alexandria Standard Cable

**CHANNEL LINEUP:**

019 WHUT PBS



020 WDCA MyNetworkTV



021 WMDE



022 WMPT PBS



023 HSN HSN

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 22003

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Washington Digital

Comcast Washington Standard Cable

**CHANNEL LINEUP:**

019 JWLTV JewelryTV



020 WDCA MyNetworkTV



021 WMDE



022 WMPB PBS



023 WDCW CW

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 22003

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Washington Digital

Comcast Washington Standard Cable

**CHANNEL LINEUP:**

804 WRCD NBC



805 WTTGD FOX



806 WMDED



807 DWJLA ABC



808 NEWS8

[View more service areas](#)

Cancel

SAVE



## Choose your service area

ZIP CODE: 22003

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Washington Digital

Comcast Washington Standard Cable

**CHANNEL LINEUP:**

019

JWLTV

JewelryTV



020

WDCA

MyNetworkTV



021

WMDE



022

WMPB

PBS



023

WDCW

CW

[View more service areas](#)

Cancel

SAVE



## Choose your service area

ZIP CODE: 22030

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Washington Digital

Comcast Washington Standard Cable

**CHANNEL LINEUP:**

019 JWLTV JewelryTV



020 WDCA MyNetworkTV



021 WMDE



022 WMPB PBS



023 WDCW CW

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 22030

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Washington Digital

Comcast Washington Standard Cable

**CHANNEL LINEUP:**

804 WRCD NBC



805 WTTGD FOX



806 WMDED



807 DWJLA ABC



808 NEWS 8

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 22030

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Washington Digital

Comcast Washington Standard Cable

**CHANNEL LINEUP:**

019

JWLTV

JewelryTV



020

WDCA

MyNetworkTV



021

WMDE



022

WMPB

PBS



023

WDCW

CW

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 22031

SEARCH

Verify your selected service area based on the channel lineup to the right.

### SERVICE AREA:

Comcast Arlington Digital

Comcast Arlington Standard Cable

### CHANNEL LINEUP:



019 WHUT PBS



020 WDCA MyNetworkTV



021 WMDE



022 WMPT PBS



023 HSN HSN

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 22031

SEARCH

Verify your selected service area based on the channel lineup to the right.

### SERVICE AREA:

Comcast Arlington Digital

Comcast Arlington Standard Cable

### CHANNEL LINEUP:



804 WRCD NBC



805 WTTGD FOX



806 WMDED



807 DWJLA ABC



808 News8

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 22031

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Arlington Digital

Comcast Arlington Standard Cable

**CHANNEL LINEUP:**

	019	WHUT	PBS
	020	WDCA	MyNetworkTV
	021	WMDE	
	022	WMPT	PBS
	023	WMN	WMN

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 22060

SEARCH

Verify your selected service area based on the channel lineup to the right.

### SERVICE AREA:

Comcast Prince William Cnty Digital

Comcast Prince William Cnty Standard Cable

[View more service areas](#)

### CHANNEL LINEUP:

WMDE-TV 019 WMDE-TV Public Access (P.A.)



019 WHUT PBS



020 WDCA MyNetworkTV



021 WMDE



022 WMPT PBS



023 WMPT PBS

Cancel

SAVE

## Choose your service area

ZIP CODE: 22060

SEARCH

Verify your selected service area based on the channel lineup to the right.

### SERVICE AREA:

Comcast Prince William Cnty Digital

Comcast Prince William Cnty Standard Cable

[View more service areas](#)

### CHANNEL LINEUP:



804 WRCD NBC



805 WTTGD FOX



806 WMDE



807 DWJLA ABC



808 NewsR

Cancel

SAVE



## Choose your service area

ZIP CODE: 22060

SEARCH

Verify your selected service area based on the channel lineup to the right.

### SERVICE AREA:

Comcast Prince William Cnty Digital

Comcast Prince William Cnty Standard Cable

### CHANNEL LINEUP:



019 WHUT PBS



020 WDCA MyNetworkTV



021 WMDE



022 WMPT PBS



023 GA Public Access (PEG)

[View more service areas](#)

Cancel

SAVE



## Choose your service area

ZIP CODE: 22066




SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Loudoun County Digital

Comcast Loudoun County Standard Cable

[View more service areas](#)**CHANNEL LINEUP:** 010 EDUC Public Access (PEG) 019 WHUT PBS 020 WDCA MyNetworkTV 021 WMDE 022 WMPB PBS

Cancel

SAVE

## Choose your service area

ZIP CODE: 22066




SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Loudoun County Digital

Comcast Loudoun County Standard Cable

[View more service areas](#)**CHANNEL LINEUP:** 804 WRCD NBC 805 WTTGD FOX 806 WMDED 807 DWJLA ABC 808 News8

Cancel

SAVE

## Choose your service area

ZIP CODE: 22066

SEARCH

Verify your selected service area based on the channel lineup to the right.

### SERVICE AREA:

Comcast Loudoun County Digital

Comcast Loudoun County Standard Cable

### CHANNEL LINEUP:

	019	WHUT	PBS	^
	020	WDCA	MyNetworkTV	
	021	WMDE		
	022	WMPB	PBS	
	023	GA	Public Access (PEG)	v

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 20170

SEARCH

Verify your selected service area based on the channel lineup to the right.

### SERVICE AREA:

Comcast Reston Digital

Comcast Reston Standard Cable

### CHANNEL LINEUP:



019 CCC Public Access (PEG)



020 WDCA MyNetworkTV



021 WMDE



022 WMPT PBS



023 CSPAN C-SPAN

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 20170

SEARCH

Verify your selected service area based on the channel lineup to the right.

### SERVICE AREA:

Comcast Reston Digital

Comcast Reston Standard Cable

### CHANNEL LINEUP:



804 WRCD NBC



805 WTTGD FOX



806 WMDED



807 DWJLA ABC



808 News8

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 20170

SEARCH

Verify your selected service area based on the channel lineup to the right.

### SERVICE AREA:

Comcast Reston Digital

Comcast Reston Standard Cable

### CHANNEL LINEUP:



019 CCC

Public Access (PEG)



020 WDCA

MyNetworkTV



021 WMDE



022 WMPT

PBS



023 CSPAN

C-SPAN

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 22101

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Arlington Digital

Comcast Arlington Standard Cable

[View more service areas](#)**CHANNEL LINEUP:**

019

WHUT

PBS



020

WDCA

MyNetworkTV



021

WMDE



022

WMPT

PBS



023

HSN

HSN

Cancel

SAVE

## Choose your service area

ZIP CODE: 22101

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Arlington Digital

Comcast Arlington Standard Cable

[View more service areas](#)**CHANNEL LINEUP:**

804

WRCD

NBC



805

WTTGD

FOX



806

WMDED



807

DWJLA

ABC



808

News8

Cancel

SAVE



## Choose your service area

ZIP CODE: 22101

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Arlington Digital

Comcast Arlington Standard Cable

**CHANNEL LINEUP:**

	019	WHUT	PBS
	020	WDCA	MyNetworkTV
	021	WMDE	
	022	WMPT	PBS
	023	WMPT	PBS

[View more service areas](#)

Cancel

SAVE



## Choose your service area

ZIP CODE: 20190


SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Loudoun County Digital  
Comcast Loudoun County Standard Cable  
Comcast Reston Digital  
Comcast Reston Standard Cable

[View more service areas](#)**CHANNEL LINEUP:**

	019	WHUT	PBS
	020	WDCA	MyNetworkTV
	021	WMDE	
	022	WMPB	PBS
	023	GA	Public Access (PEG)

Cancel

SAVE

## Choose your service area

ZIP CODE: 20190

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Loudoun County Digital  
Comcast Loudoun County Standard Cable  
Comcast Reston Digital  
Comcast Reston Standard Cable

[View more service areas](#)**CHANNEL LINEUP:**

	804	WRCD	NBC
	805	WTTGD	FOX
	806	WMDED	
	807	DWJLA	ABC
	808	News 8	

Cancel

SAVE

## Choose your service area

ZIP CODE: 20190





SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Loudoun County Digital  
Comcast Loudoun County Standard Cable  
Comcast Reston Digital  
Comcast Reston Standard Cable

**CHANNEL LINEUP:**

	019	WHUT	PBS
	020	WDCA	MyNetworkTV
	021	WMDE	
	022	WMPB	PBS
	023	GA	Public Access (PEG)

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 20190

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Loudoun County Digital  
Comcast Loudoun County Standard Cable  
Comcast Reston Digital  
Comcast Reston Standard Cable

**CHANNEL LINEUP:**

	019	CCC	Public Access (PEG)
	020	WDCA	MyNetworkTV
	021	WMDE	
	022	WMPT	PBS
	023	CSPAN	C-SPAN

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 20190

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Loudoun County Digital  
Comcast Loudoun County Standard Cable  
**Comcast Reston Digital**  
Comcast Reston Standard Cable

**CHANNEL LINEUP:**

	804	WRCD	NBC
	805	WTTGD	FOX
	806	WMDE	
	807	DWJLA	ABC
	808	News8	

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 20190




SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Loudoun County Digital  
Comcast Loudoun County Standard Cable  
Comcast Reston Digital  
**Comcast Reston Standard Cable**

**CHANNEL LINEUP:**

	019	CCC	Public Access (PEG)
	020	WDCA	MyNetworkTV
	021	WMDE	
	022	WMPT	PBS
	023	CSPAN	C-SPAN

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 20191

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Reston Digital

Comcast Reston Standard Cable

**CHANNEL LINEUP:**

019 CCC Public Access (PEG)



020 WDCA MyNetworkTV



021 WMDE



022 WMPT PBS



023 CSPAN C-SPAN

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 20191

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Reston Digital

Comcast Reston Standard Cable

**CHANNEL LINEUP:**

804 WRCD NBC



805 WTTGD FOX



806 WMDED



807 DWJLA ABC



808 News8

[View more service areas](#)

Cancel

SAVE



## Choose your service area

ZIP CODE: 20191

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Reston Digital

Comcast Reston Standard Cable

**CHANNEL LINEUP:**

019 CCC Public Access (PEG) ^



020 WDCA MyNetworkTV



021 WMDE



022 WMPT PBS



023 CSPAN C-SPAN v

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 20194

SEARCH

Verify your selected service area based on the channel lineup to the right.

### SERVICE AREA:

Comcast Reston Digital

Comcast Reston Standard Cable

### CHANNEL LINEUP:

018 EDCB Public Access (PEG)

019 CCC Public Access (PEG)

020 WDCA MyNetworkTV

WMDE 021 WMDE

022 WMPT PBS

023 GORDAN GORDAN

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 20194

SEARCH

Verify your selected service area based on the channel lineup to the right.

### SERVICE AREA:

Comcast Reston Digital

Comcast Reston Standard Cable

### CHANNEL LINEUP:

NBC HD 804 WRCD NBC

FOX HD 805 WTTGD FOX

WMDE 806 WMDED

abc HD 807 DWJLA ABC

808 News8

[View more service areas](#)

Cancel

SAVE



## Choose your service area

ZIP CODE: 20194

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Reston Digital

Comcast Reston Standard Cable

**CHANNEL LINEUP:**

019 CCC Public Access (PEG)



020 WDCA MyNetworkTV



021 WMDE



022 WMPT PBS



023 CSPAN C-SPAN

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 22150

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Washington Digital

Comcast Washington Standard Cable

**CHANNEL LINEUP:**

019 JWLTV JewelryTV



020 WDCA MyNetworkTV



021 WMDE



022 WMPB PBS



023 WDCW CW

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 22150

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Washington Digital

Comcast Washington Standard Cable

**CHANNEL LINEUP:**

804 WRCD NBC



805 WTTGD FOX



806 WMDED



807 DWJLA ABC



808 NFWS8

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 22150

SEARCH






Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Washington Digital

Comcast Washington Standard Cable

**CHANNEL LINEUP:**

	019	JWLTV	JewelryTV	^
	020	WDCA	MyNetworkTV	
	021	WMDE		
	022	WMPB	PBS	
	023	WDCW	CW	v

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 22182

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Reston Digital

Comcast Reston Standard Cable

**CHANNEL LINEUP:**

019 CCC Public Access (PEG)



020 WDCA MyNetworkTV



021 WMDE



022 WMPT PBS



023 CSPAN C-SPAN

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 22182

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Reston Digital

Comcast Reston Standard Cable

**CHANNEL LINEUP:**

804 WRCD NBC



805 WTTGD FOX



806 WMDED



807 DWJLA ABC



808 News8

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 22182

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Reston Digital

Comcast Reston Standard Cable

**CHANNEL LINEUP:**

019 CCC Public Access (PEG)



020 WDCA MyNetworkTV



021 WMDE



022 WMPT PBS



023 CSPAN C-SPAN

[View more service areas](#)

Cancel

SAVE



## Choose your service area

ZIP CODE: 22311

Verify your selected service area based on the channel lineup to the right.

### SERVICE AREA:

Comcast Alexandria Digital  
Comcast Alexandria Standard Cable

[View more service areas](#)

### CHANNEL LINEUP:

	019	WHUT	PBS
	020	WDCA	MyNetworkTV
	021	WMDE	
	022	WMPT	PBS
	023	WMAT	WMAT

## Choose your service area

ZIP CODE: 22311

Verify your selected service area based on the channel lineup to the right.

### SERVICE AREA:

Comcast Alexandria Digital  
Comcast Alexandria Standard Cable

[View more service areas](#)

### CHANNEL LINEUP:

	804	WRCD	NBC
	805	WTTGD	FOX
	806	WMDED	
	807	DWJLA	ABC
	808	News8	

## Choose your service area

ZIP CODE: 22311

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Alexandria Digital

Comcast Alexandria Standard Cable

**CHANNEL LINEUP:**

	019	WHUT	PBS
	020	WDCA	MyNetworkTV
	021	WMDE	
	022	WMPT	PBS
	023	WMAT	WMAT

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 22302

SEARCH

Verify your selected service area based on the channel lineup to the right.

### SERVICE AREA:

Comcast Alexandria Digital

Comcast Alexandria Standard Cable

### CHANNEL LINEUP:

	019	WHUT	PBS
	020	WDCA	MyNetworkTV
	021	WMDE	
	022	WMPT	PBS
	023	WMGM	WMGM

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 22302

SEARCH

Verify your selected service area based on the channel lineup to the right.

### SERVICE AREA:

Comcast Alexandria Digital

Comcast Alexandria Standard Cable

### CHANNEL LINEUP:

	804	WRCD	NBC
	805	WTTGD	FOX
	806	WMDED	
	807	DWJLA	ABC
	808	News8	

[View more service areas](#)

Cancel

SAVE

## Choose your service area

ZIP CODE: 22302

SEARCH

Verify your selected service area based on the channel lineup to the right.

**SERVICE AREA:**

Comcast Alexandria Digital

Comcast Alexandria Standard Cable

**CHANNEL LINEUP:**

	018	WDCV	PBS Family
	019	WHUT	PBS
	020	WDCA	MyNetworkTV
	021	WMDE	
	022	WMPT	PBS
	023	WMDE	WMDE

[View more service areas](#)

Cancel

SAVE

**EXHIBIT 6**  
**Lohnes and Culver Technical Exhibit and**  
**Longley-Rice Contour Study**



**TECHNICAL EXHIBIT  
LONGLEY-RICE STUDY  
WMDE 10 KW-ND 145M HAAT CH. 5  
DOVER, DELAWARE**

**INTRODUCTION**

This exhibit was prepared on behalf of Western Pacific Broadcast, LLC (“Western Pacific”), licensee of digital television station WMDE, Dover, Delaware (Facility ID No. 189357) (“WMDE”), in support of an opposition to the *Petition for Special Relief* filed by CoxCom, LLC (“CoxCom”) on May 20, 2015 (the “Petition”). It provides a service area map that delineates the technical service area of WMDE in relation to the communities served by CoxCom’s cable systems in Fairfax County, VA (the “CoxCom Cable Communities”).

**NOISE-LIMITED SERVICE CONTOUR**

The technical service area of WMDE is defined by the noise-limited service contour where its signal strength is predicted to exceed the noise-limited service level.<sup>1</sup> For VHF stations that operate on Channels 2 – 6 the noise-limited level is 28 dBu and the minimum field strength for principal community coverage compliance is 35 dBu.<sup>2</sup> The map included as Figure 1 depicts the 28 dBu and 35 dBu service contours of WMDE, as determined using the standard F(50,90) propagation curves based on the licensed parameters in FCC File No. 0000001038.<sup>3</sup>

**LONGLEY-RICE FIELD STRENGTH**

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<sup>1</sup> The Commission treats a digital station’s noise-limited service contour as the functional equivalent of an analog station’s Grade B contour. See *Report To Congress: The Satellite Home Viewer Extension and Reauthorization Act of 2004; Study of Digital Television Field Strength Standards and Testing Procedures*, 20 FCC Rcd 19504, 19507 ¶ 3 (2005).

<sup>2</sup> See 47 C.F.R. Section 73.73.625(a).

<sup>3</sup> See 47 C.F.R. Section 73.625(b).

The Longley-Rice (LR) signal propagation model (version 1.2.2) demonstrates that WMDE's technical service area extends further than predicted by the standard F(50,90) curves as Figure 1 also shows.<sup>4</sup> This determination was made using the FCC's *tv\_process* software, which implements the LR model in the point-to-point mode using the analysis parameters and procedures described in OET Bulletin 69 (OET-69) for evaluating television service in the absence of interference.<sup>5</sup> The analysis software divides the subject area into rectangular cells and applies the LR signal prediction method to determine whether the calculated field strength in each cell equals or exceeds the aforementioned noise-limited service threshold of 28 dBu. For this analysis, the evaluation of service coverage was conducted using the normal 1.0 km terrain retrieval increment and 2.0 km cell size settings.<sup>6</sup>

OET-69 is designed to predict service availability within a station's noise-limited F(50,90) contour, at locations that are intended to be representative of a surrounding area or cell. In this context, the Commission assumes service for cells when LR error warnings appear based on the traditional assumption that service is available throughout a station's coverage area. Many of the CoxCom Cable Communities lie outside of WMDE'S noise-limited F(50,90) contour and, therefore, the usual treatment of error warnings might overestimate coverage to those areas. To improve the reliability of the service analysis, error warnings were ignored in applying the OET-69 methodology.

The results of the OET-69 analysis indicate that WMDE's signal provides coverage to 98.8% of the population and 98.5% of the land area in Falls Church; 76.6% of the population and 75.3% of the land area in Fairfax City; and, 71.9% of the

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<sup>4</sup> 47 C.F.R. Section 76.59 indicates in a note to Paragraph (b)(2) that the Longley-Rice (version 1.2.2) propagation model may be used to support a technical service exhibit.

<sup>5</sup> The *tv\_process* software is linked to a terrain elevation database with values every 3 arc-seconds of latitude and longitude.

<sup>6</sup> The 2.0 km cell size is commonly used for determining DTV service areas pursuant to Section 73.622(e) and is regarded as the default for evaluating post-transition interference protection compliance in Section 73.616(e)(1).

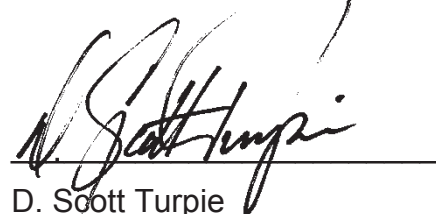
population and 64.5% of the land area in Fairfax County.<sup>7</sup> Additional details concerning these percentages are listed in Figure 1. The color theme used in Figure 1 reflects the LR predicted signal levels in tiered increments of 7 dB, beginning at the noise-limited service threshold of 28 dBu.<sup>8</sup>

The Petition indicates that WMDE's field strength at the headend location is calculated to be 30.4 dBu using the LR propagation method.<sup>9</sup> This determination is consistent with the findings of the undersigned. The location of the CoxCom headend is indicated on the coverage map of Figure 1.

### **CERTIFICATION**

The undersigned, who has been engaged in the field of consulting radio and television engineering since 1985 and whose qualifications are a matter of record with the Federal Communications Commission, declares under penalty of perjury that all of the facts and data included in or attached to the foregoing statement are true and correct to the best of his knowledge and belief.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D. Scott Turpie", is written over a horizontal line.

D. Scott Turpie  
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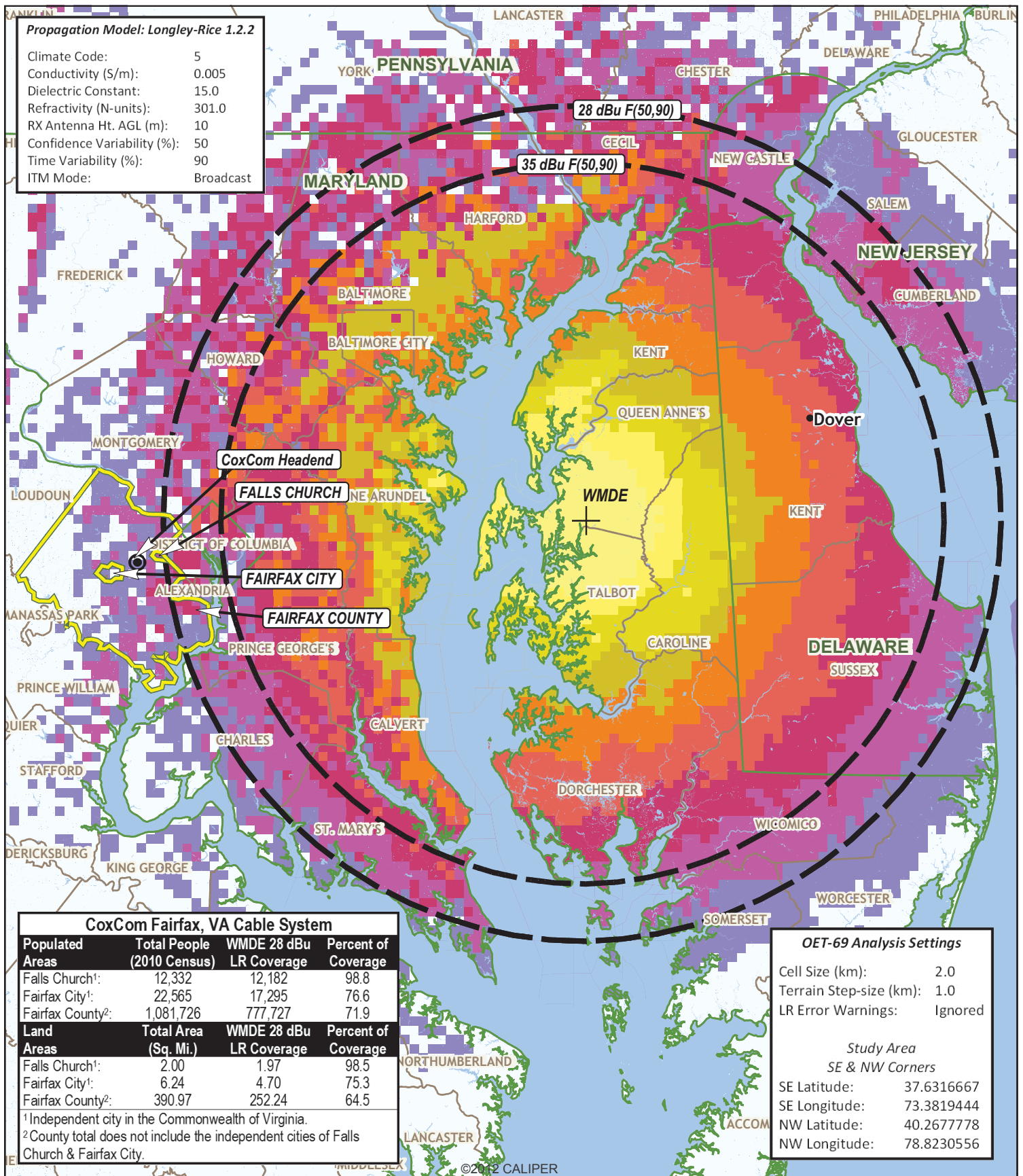
June 25, 2015

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<sup>7</sup> Alexandria, Fairfax City and Falls Church are independent cities in the Commonwealth of Virginia that are contiguous with Fairfax County and, therefore, the coverage evaluation of Fairfax County excludes those independent cities. Falls Church and Fairfax City were likewise evaluated for coverage separate from Fairfax County.

<sup>8</sup> The 7 dB increment mirrors the difference between noise-limited service and city grade service.

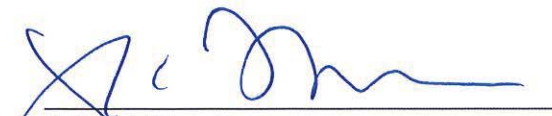
<sup>9</sup> See the Petition in Exhibit 2 (Engineering Statement) at Page 4 and Figure 6.



## DECLARATION OF JOHN C. TROUTMAN

I, John C. Troutman, declare under penalty of perjury the following:

1. I am Vice President of Western Pacific Broadcast, LLC, licensee of WMDE(TV), Dover, Delaware.
2. I have read the foregoing Opposition to Petition for Special Relief, and to the best of my knowledge, information, and belief formed after reasonable inquiry, it is well-grounded in fact and is warranted by existing law.



---

John C. Troutman  
Vice President  
Western Pacific Broadcast, LLC

June 25, 2015



## CERTIFICATE OF SERVICE

I, Ericia Johnson Cooper, hereby certify that on June 25, 2015, copies of the foregoing Opposition to Petition for Special Relief were sent via First Class Mail, postage pre-paid (unless otherwise stated), to the following:

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